

Detria Legg

16CV0821

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

SDNY

Jury Trial: ☐ Yes ☐ No  
(check one)



(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Detria Legg

Street Address

121-090197 Street

County, City

Springfield Gdus

State & Zip Code

New York, 11413

Telephone Number

718-986-1073

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name

SDNY

Street Address

500 Pearl Street

County, City New York  
 State & Zip Code New York, 10032  
 Telephone Number \_\_\_\_\_

Defendant No. 2 Name Manhattan Psychiatric Center  
 Street Address 600 East 125th Street  
 County, City New York  
 State & Zip Code New York, 10035  
 Telephone Number 646-672.-

Defendant No. 3 Name Smallwood MHTA  
 Street Address 600 East 125th Street  
 County, City New York  
 State & Zip Code New York, 10035  
 Telephone Number \_\_\_\_\_

Defendant No. 4 Name Fred Daniels / Carole Pierre  
 Street Address 600 East 125th Street  
 County, City New York  
 State & Zip Code New York, 10035  
 Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)  
☒ Federal Questions ☐ Diversity of Citizenship
- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? New York State, Nassau, Long Island, Bath
- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?  
 Plaintiff(s) state(s) of citizenship New York State  
 Defendant(s) state(s) of citizenship New York State

## III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur?

NYC, Manhattan Psychiatric Center, Queens, Jamaica

B. What date and approximate time did the events giving rise to your claim(s) occur?

April, 2000 - July 2005

C. Facts:

What happened to you?

Defendants have a sealed case filed in your SDNY Criminal Court. The case was filed during the period mentioned above. The case originated with an (Smallwood) MPC employee's son as a defendant in a criminal matter and moved to include all defendant's noted on page 2 of the complaint. Manhattan Psychiatric Center's District Attorney, Deputy Director and Director were all noted in the case and present.

Who did what?

Was anyone else involved?

Who else saw what happened?

#### IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

I am requesting the Honorable Judge release the sealed record filed in your court. The record or file or document is subpoena by (Queen County Civil Court: case # 24261/14) for pertinent information and validity. The plaintiff is seeking Candice Cortez and a monetary award for all injuries (physical/mental including assault; and property restoration).

**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

The plaintiff and attorney (A. Ghuman, ESQ) are seeking the sealed or unsealed record, we need the honorable judge's permission to unseal the records. There is no monetary compensation being sought at this time, there may be a future file.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1 day of February, 2016

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

121-09 1197 Street  
Springfield Glens, NY  
11413  
718-986-1073

**Note:** All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

**For Prisoners:**

I declare under penalty of perjury that on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: \_\_\_\_\_

Inmate Number \_\_\_\_\_



Check No. \_\_\_\_\_



4033 38976376  
0000151221C1M4

DETRIA LEGG FOR  
OMARI LEGG WASHINGTON  
12109 197 STREET  
SPRINGFIELD GARDENS NY 11413 1140

\$\*\*\*\*\*577\*00

VOID AFTER ONE YEAR

SOC SEC FOR DEC

PERSONAL (UNCLASSIFIED) OFFICIAL

11007

By 1.00

114033711

000000518: 38976376 071215

[illegible]

<b>Thomas P. DiNapoli</b> <b>State Comptroller</b>		<b>DETRIA LEGG</b>				Total Gross		Fed Taxable Gross	
						Current	1,253.92	1,336.87	YTD
Check #	36558277	Pay Start Date	12/24/2015	Negotiating Unit	05	<b>Net Pay</b>		<b>1,011.70</b>	
Check Date	01/21/2016	Pay End Date	01/06/2016	Retirement System	ERS				
Department ID	50080	NYS EMPLID	N01221975			Pay Rate	66,494.00		
<b>EARNINGS</b>		Current		YTD		<b>TAX DATA</b>			
	Hrs/Days	Earnings	Hrs/Days	Earnings		Federal	State	NYC	Yonkers
Regular Pay Salary Employee		1,271.73		2,543.46	Marital Status	\$	\$	\$	
Final PEF DRP Repayment		57.28		114.56	Allowances	7	7	8	
Location Pay		57.87		115.74	Addl. Aml.				
Overpaid In 2015		-132.96		-265.92					
					<b>TAXES</b>		Current		YTD
					Fed Withholding		15.99	31.98	
					Medicare		19.39	38.77	
					Social Security		82.88	165.77	
					NY Withholding		37.77	75.54	
					NYC Withholding		23.70	47.40	
<b>BEFORE TAX DEDUCTIONS</b>		Current		YTD	<b>AFTER TAX DEDUCTIONS</b>		Current		YTD
Regular Before Tax Health		50.01		100.02	ERS Retirement After Tax		12.48		24.96
					PEF Member				

Household expenses Ins. \$179.27/month x 12m = \$2151.24  
 Tax \$90.00/month x 12m = \$1080.00  
 Water \$100.00/month x 12m = \$1200.00  
 Telephone \$28.00/month x 12m = \$336.00  
 Electric \$117.00/month x 12m = \$1404.00  
 Gas \$150.00/month x 12m = \$1800.00  
 Car Insurance \$80.00/month x 12m = \$960.00  
 Cell \$60.00/month x 12m = \$720.00  
 Cell \$45.00/month x 12m = \$540.00  
 Total \$949.27/month x 12m = \$11,391.24

Signature

Date

Signature

Date

Signature

Date

Signature

Date

CIV-GP-32-I (5105)

FREE CIVIL COURT FORM

No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/civil/forms.shtml>.

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF QUEENS

-----X  
Detria Legg,

Plaintiff,

Index No. 024261 /2014

-against-

**COMPLAINT**

Fred Daniels & Carole Pierre,

Defendant.  
-----X

TO THE CIVIL COURT OF THE CITY OF NEW YORK

The complaint of the plaintiff, Detria Legg, Pro Se, respectfully  
shows and alleges as follows:

1. The plaintiff herein, Detria Legg, is a resident of the State of New York. Ms. Legg resides at 121-09 197<sup>th</sup> Street, Springfield Gdns, New York.
2. The defendant(s) herein, Fred Daniels & Carole Pierre, had a principal place of business at Manhattan Psychiatric Center, Wards Island Complex, Wards Island, NY. Defendant, is retired and was engaged in the business of Administration, and as a Licensed Practical Nurse and Carole Pierre, is a license Doctor of Dental Hygiene.
3. Plaintiff Legg, Pro Se, desired to see Candice Cortez. She discussed it with Fred Daniels, LPN, and was denied. Plaintiff's Cause of Action, Civil Right violated with the suspicions of a Alien Kidnapping Prevention, Private Nuisance for pollution, Physical behavior evidence of abuse, and time within which, origin decree, is malicious abuse by person other than parent. Thomas Reuters Corp. Cause of



Action, Easy Access, 2013; Volume 1-30; Volume 1-58, COA2d: pg. 62 and 864.

4. On June 16, 1997, plaintiff and defendant, after a walk-in court preceding with Honorable Judge Paynter, Queens Criminal Court, 125-01, Queens Blvd., Kew Gardens, NY 11415, Part \_\_ Term\_. Candice Cortez was ordered to reside at 121-09 197<sup>th</sup> Street, Springfield Gardens NY, 11413.

5. Candice Cortez, was last seen with Fred Daniels. I am requesting the defendant(s), to produce Candice Cortez, to 89-17 Sutphin Blvd., Jamaica New York, 11435, New York City, Civil Court, with certified birth certificate and social security card, at 9:00am on the date of, September 2014, and to further state that she is an independent adult; and to proceed legally within the US legal system.

6. If the defendant(s) does not respond to the summons and complaint, I will request counsel to proceed to further criminal preceding, Reuters & Getty. 2013. Cops tried to visit Ohio home. AM News, May 8, 2013.

WHEREFORE, plaintiff demands judgment against defendant in the sum of \$5,000.00, plus interest from August, 7, 2014, cost and disbursements, together with any other relief the Court finds to be just and proper.

Dated: August 7, 2014

  
Detria Legg, Pro Se  
121-09 197<sup>th</sup> Street  
Springfield Gdns New York, 11413

VERIFICATION

Detria Legg, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

9/5/14

Detria Legg, Pro Se

**Civil Court of the City of New York**  
**County of Queens**

Index Number: CV-024261-14/QU

DETRIA LEGG

Plaintiff(s)

-against-

FRED DANIELS; CAROLE PIERRE

Defendant(s)

**SUMMONS WITH ENDORSED  
COMPLAINT**

BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :

DETRIA LEGG

121-09 197TH STREET

Springfield Gardens, NY 11413

To the named defendant (s)

FRED DANIELS (Deft), at 600 EAST 125TH STREET, WARDS ISLAND, NY 10035

CAROLE PIERRE (Deft), at 600 EAST 125TH STREET, WARDS ISLAND, NY 10035

**YOU ARE HEREBY SUMMONED** to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at 89-17 Sutphin Boulevard in the **County of Queens, City and State of New York**, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) \* with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of \$1,000.00 and interest as detailed below.

Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: September 11, 2014

Carol Alt  
Chief Clerk

**ENDORSED COMPLAINT**

The nature and the substance of the plaintiff's cause of action is as follows: **Breach of Contract or Warranty ; Damage cause to property other than automobile ; Failure to provide repairs ; Failure to return property; Failure to return money; Failure to pay for services rendered ; Failure to pay for money loaned ; Loss of property ; Loss of time from work ; Loss of use of property; Returned merchandise for \$1,000.00 with interest from 01/03/2007;**

***\*NOTE TO THE DEFENDANT***

*A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within **TWENTY** days after such service; or*

*B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed **THIRTY** days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.*

*C) Following CPLR 321(a) corporations must be represented by an attorney.*

***\* NOTE TO THE SERVER OF THE SUMMONS***

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

**PLAINTIFF'S CERTIFICATION**

*( See 22NYCRR, Section 130-1.1a)*

SIGN NAME:

PRINT NAME:

*D Legg / A. G. Shuman, Esq*  
DETRIA LEGG

**Lefferts Medical Associates PC**

266-19 Union Turnpike,  
New Hyde Park, NY 11040

Phone: (718)347-0434

Fax: (718)347-0517

[www.Leffertsmedical.com](http://www.Leffertsmedical.com)

05/08/2015

TO WHOM IT MAY CONCERN:

Please be advised that Mrs. Detria Legg D.O.B.09/14/1963 has been a patient of this practice.

Mrs. Legg is physically and mentally fit to return to work with not restrictions.

Please contact us at the above mentioned phone number if any further information is required.

Sincerely,



Inderpal Chhabra, MD, FACP  
Lefferts Medical Associates, PC  
266-19 Union Turnpike  
New Hyde Park, NY 11040

Inderpal Chhabra M.D. F.A.C.P.

**SHAMA RASOOL, M.D.**

---

Forest Hills Psychiatric, PC  
76-03 113<sup>TH</sup> STREET  
FOREST HILLS, NY 11375

Date: 04/08/15

Patient: Detria , Legg  
DOB: 09/14/1963

To Whom It May Concern:

The above name patient was seen in my office today for an appointment.

If you have any questions, feel free to contact me at (718) 268-1100.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'SR' followed by a stylized flourish.

SHAMA RASOOL, M.D.



State of New York, County of Queens  
Civil Court of the City of New York Civil Part

DETRIA LEGG

Plaintiff(s)

-against-

FRED DANIELS; CAROLE PIERRE

Defendant(s)

Index Number: CV-024261-14/QU

**SUBPOENA FOR RECORDS**

Requested by:

DETRIA LEGG

121-09 197TH STREET

Springfield Gardens, NY 11413

**THE PEOPLE OF THE STATE OF NEW YORK**

To: **UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT COURT OF NEW YORK;  
UNITED STATES COURT HOUSE 500 PEARL STREET NEW YORK, NY 10007**

We command that you or someone on your behalf provide and produce the following item(s), along with a copy of this subpoena:

\$OT{Optional-Description of what needs to be subpoenaed} Attn:Record Room

~~Subpoena~~

Subpoena for Records: Fred Daniels; Carole Pierre vs Manhattan Psychiatric Center or People or NYS or Smallwood, Et. Al., (1993-2000).

To the Clerk of the Civil Court of the City of New York County of Queens located at **89-17 Sutphin Boulevard, Jamaica, NY 11435** on or before **March 9, 2016** in Part **11** - Self Represented Non-Jury 101 at 9:30 AM

☒ to the Records Section of this Court located in Room **QUEENS CIVIL COURT 89-17 SUTPHIN BLVD ROOM 147 JAMAICA NY 11435**

☒ to the Hon II in Part II, Room 101.

**NOTE:** A copy of any subpoena for records served in a pending action shall also be served on each party who has appeared in the action, according to CPLR Rule 2103, so that it is received by such parties promptly after service on the witness and before the production of books, papers or other things. You need not pay a witness fee to anyone other than the witness, but you must fill out an affidavit of service for each party served, as well as for the witness.

Failure to comply with a subpoena may be punishable as contempt of court and/or make you liable for a penalty not exceeding **ONE HUNDRED FIFTY DOLLARS (\$150.00)** and damages sustained by the person on whose behalf the subpoena was issued (CPLR 2308).

Date: October 27, 2015

  
CHIEF CLERK

Carol Alt  
Chief Clerk

If required, So Ordered:

Judge of the Civil Court of the City of New York

**Affidavit of Process Server**STATE OF NEW YORK, COUNTY OF QUEENS, CIVIL COURT OF THE CITY OF NEW YORK / CIVIL PART  
(NAME OF COURT)DETRIA LEGG vs FRED DANIELS; CAROLE PIERRE CV-024261-14/QU  
PLAINTIFF/PETITIONER DEFENDANT/RESPONDENT CASE NUMBERI, ROBERT L. LAWSON, being first duly sworn, depose and say: that I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to perform said service.Service: I served UNITED STATES DISTRICT COURT, SDNY  
NAME OF PERSON / ENTITY BEING SERVEDwith (list documents) SUBPOENA FOR RECORDSby leaving with MAILED At

<input type="checkbox"/> Residence	NAME	RELATIONSHIP
<input checked="" type="checkbox"/> Business	ADDRESS	CITY / STATE
	<u>500 PEARL STREET, ATTN: RECORD ROOM</u>	<u>NEW YORK, NY 10007</u>
	ADDRESS	CITY / STATE

On OCTOBER 5, 2015 AT 4:00 PM  
DATE TIME☐ Inquired if subject was a member of the U.S. Military and was informed they are not.Thereafter copies of the documents were mailed by prepaid, first class mail on OCTOBER 5, 2015  
DATEfrom NEW YORK NY 10001  
CITY STATE ZIP**Manner of Service:**


- ☐ **Personal:** By personally delivering copies to the person being served.
- ☐ **Substituted at Residence:** By leaving copies at the dwelling house or usual place of abode of the person being served with a member of the household over the age of \_\_\_\_\_ and explaining the general nature of the papers.
- ☐ **Substituted at Business:** By leaving, during office hours, copies at the office of the person/entity being served with the person apparently in charge thereof.
- ☐ **Posting:** By posting copies in a conspicuous manner to the front door of the person/entity being served.

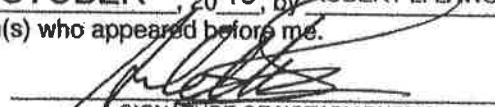
**Non-Service:** After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

- ☐ Unknown at Address    ☐ Moved, Left no Forwarding    ☐ Service Cancelled by Litigant    ☐ Unable to Serve in Timely Fashion
- ☐ Address Does Not Exist    ☐ Other \_\_\_\_\_

Service Attempts: Service was attempted on: (1) \_\_\_\_\_ (2) \_\_\_\_\_  
DATE TIME DATE TIME(3) \_\_\_\_\_ (4) \_\_\_\_\_ (5) \_\_\_\_\_  
DATE TIME DATE TIME DATE TIME

Description: Age \_\_\_\_\_ Sex \_\_\_\_\_ Race \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Hair \_\_\_\_\_ Beard \_\_\_\_\_ Glasses \_\_\_\_\_

  
 \_\_\_\_\_  
 SIGNATURE OF PROCESS SERVER
SUBSCRIBED AND SWORN to before me this 16th day of OCTOBER, 20 15, by ROBERT L. LAWSON  
Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.
 ARLETTE SIMMONS  
 Notary Public State of New York  
 No: 01515162427  
 Qualified in New York County  
 My Commission Expires November 05, 2017

  
 \_\_\_\_\_  
 SIGNATURE OF NOTARY PUBLIC  
 NOTARY PUBLIC for the state of NEW YORK


State of New York, County of Queens  
Civil Court of the City of New York Civil Part

Index Number: CV-024261-14/QU

DETRIA LEGG

Plaintiff(s)

-against-

FRED DANIELS; CAROLE PIERRE

Defendant(s)

**SUBPOENA FOR RECORDS**

Requested by:

DETRIA LEGG

121-09 197TH STREET

Springfield Gardens, NY 11413

**THE PEOPLE OF THE STATE OF NEW YORK**

To: **United States District Court,**  
**Southern District Court of New York: United States Court House**  
**500 Pearl Street, New York, New York 10007-1312**  
**Att: Records Room**

We command that you or someone on your behalf provide and produce the following item(s), along with a copy of this subpoena:

\$OT{Optional-Description of what needs to be subpoenaed}

**Subpoena for Records: Fred Daniels; Carole Pierre vs Manhattan Psych Center or People or NYS or Smallwood, Et. Al. (1993-2000).**

To the Clerk of the Civil Court of the City of New York County of Queens located at 89-17 Sutphin Boulevard, Jamaica, NY 11435 on or before **October 8, 2015** in Part 11 - Self Represented Non-Jury 101 at 9:30 AM

- ☐ to the Records Section of this Court located in Room \_\_\_\_\_  
☐ to the Hon \_\_\_\_\_ in Part \_\_\_\_\_, Room \_\_\_\_\_

**NOTE:** A copy of any subpoena for records served in a pending action shall also be served on each party who has appeared in the action, according to CPLR Rule 2103, so that it is received by such parties promptly after service on the witness and before the production of books, papers or other things. You need not pay a witness fee to anyone other than the witness, but you must fill out an affidavit of service for each party served, as well as for the witness.

Failure to comply with a subpoena may be punishable as contempt of court and/or make you liable for a penalty not exceeding **ONE HUNDRED FIFTY DOLLARS (\$150.00)** and damages sustained by the person on whose behalf the subpoena was issued (CPLR 2308).

Date: August 25, 2015



Carol Alt  
Chief Clerk

If required, So Ordered:

\_\_\_\_\_  
Judge of the Civil Court of the City of New York

Attorney on record  
Kindly call with  
questions.  
Dy

**GHUMAN LAW & ASSOCIATES**

**Abdul Razzaq Ghuman**

Attorney at Law

**C: 571-212-9819**

**O: 718-262-0062**

**F: 718-262-0012**



**Manhattan Office**

305 Broadway, Suite 400  
New York, NY 10007

**Queens Office**

189-20 Hillside Ave, Fl 2  
Jamaica, NY 11432

ghumanlawny@gmail.com